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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-6669

174034



DATE: April 19, 1985

TO: Gerald Fontenot, Deputy Project Officer
EPA Region VI, Emergency Response Branch

THRU: Michael G. Warner, TAT Leader *AM*
Region VI, Technical Assistance Team - Dallas

FROM: Tim Woods, TAT Member *SW*
Region VI, Technical Assistance Team - Dallas

SUBJECT: Site Assessment at W.J. Smith Wood Preserving Company,
Denison, Texas

TDD#: 06-8503-16

A thorough investigation of the sludge pit closure operation at W.J. Smith Wood Preserving was conducted on April 9, 10 and 11, 1985. TAT members Tim Woods and Craig Bond met with the company president, Mr. Billy Redding and reviewed the project construction specifications and site plans. The TAT conducted an informal interview on the site's history, current condition and projected modifications. The interview confirmed and enhanced information the TAT gathered from the ten page EPA potential hazardous waste site inspection report and 62 pages of attachments. A visual site inspection followed.

The closure operations are divided into three projects. The first project involves the construction of a new concrete creosote water separator and closure of the existing earthen separator. The second project is the on-site disposal of sludge wastes in seven (7) waste creosote lagoons. These two projects are being conducted under the direction of The Texas Department of Water Resources Enforcement Branch (TDWR). The third project is a result of an accidental discovery of creosote and phenol deposits in subsurface horizons in an adjacent swale area. This swale area drains the company property onto a Missouri-Kansas-Texas (MKT) railroad right of way. MKT and W.J. Smith Wood Preservers are both subsidiaries of Katy Industries, so it was decided to use construction crews from the second project to remove the contaminated soils down to an impermeable white clay layer, then back fill to original grade. The contaminated soil (several thousand cubic yards as of April 10) is being stored in the W.J. Smith lumber yard pending a decision to move all of it to project site two for on-site disposal along with the lagoon sludge wastes.

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Inc., Jacobs Engineering Group Inc., C.C. Johnson & Associates, Inc., and Tetra Tech, Inc.,



The three project sites are all being very conscientiously managed to prevent any releases of contaminants to off-site areas. Les Potter, staff engineer from Albert H. Halff Associates, Inc., and Roger Keith, vice president of Harry Keith and Sons, Inc., both met with the TAT and spent several hours touring the three sites. These two individuals are the contract engineers and construction contractors, respectively. As a result of the visual inspections, the TAT found no current or projected potential for immediate removal actions. In phone conversations with TDWR enforcement agent David Buchanan, it was substantiated that the state of Texas also sees no potential for federal immediate removal actions. Agent Buchanan approves of the site construction progress to date and will continue to monitor the three projects.

Photographer/Witness # 1

BOND / WOODS



Date/Time/Direction

4/10/85, 1350 HRS, NORTH

Comments: DOUBLE DIKE AROUND

LAGOONS WITH REFUELING

LANE TO CONTROL CONTAM-

INATION ON HEAVY EQUIPMENT

TAT-06-F- 08695



Photographer/Witness

2

BOND / WOODS

Date/Time/Direction

4/10/85, 1400 HRS, SOUTH

Comments: DROP OFF TO THE

SOUTH OF LAGOONS WHERE

SMALL CREEK IS FLOWING

IN SOUTHEAST DIRECTION

TAT-06-F- 08696



Photographer/Witness

3

BOND / WOODS

Date/Time/Direction

4/10/85, 1516 HRS, EAST

Comments: STAGING AREA

WHERE CONTAMINATED SOIL

FROM PROJECT THREE IS

BEING STORED TEMPORARILY

TAT-06-F- 08697



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Photo. ographer/Witness # 4

BOND / WOODS

Date/Time/Direction

4/10/85, 1427 HRS, WEST

Comments: NORTHERN MOSE EDGE

OF LAGOONS WITH OLD

RAILROAD BED ALONG THE

NORTH EDGE.

TAT-06-F- 08698



Photographer/Witness # 5

BOND / WOODS

Date/Time/Direction

4/10/85, 1425 HRS, WEST

Comments: LAGOONS WHICH

ARE NOW COMBINED INTO

TWO LARGE DRYING

AREAS.

TAT-06-F- 08699



Photographer/Witness # 6

BOND / WOODS

Date/Time/Direction

4/10/85, 1352 HRS, WEST

Comments: EXCAVATED SLUDGE,

SOIL MIXTURE FROM LAGOON

MIXTURE IS DRYING OUT

PRIOR TO ADDITIONAL MIXING

TAT-06-F- 08700

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Photo. Grapher/Witness # 7

BOND / WOODS

Date/Time/Direction

4/10/85, 1403 HRS, EAST

Comments: PANORAMA OF CREEK
BED TO SOUTH, OPEN FLAT
GROUND, DOUBLE DIKES AROUND
DRYING SLUDGES, + LAGOONS ON
TAT-06-F- THE NORTH SIDE
08701

Photographer/Witness # _____

Date/Time/Direction

NOT USED

Comments: _____

TAT-06-F-

Photographer/Witness # _____

Date/Time/Direction

Comments: NOT USED

TAT-06-F-



Photo Grapher/Witness # 8BOND / WOODS

Date/Time/Direction

4/10/85, 1409 HRS, NORTHComments: LARGE CLAY LINEDCLOSURE PIT ON WEST ENDOF LAGOONS. A FEW MOREFEET TO BE EXCAVATED PRIORTAT-06-F- TO FINISHING THE PIT
08702

Photographer/Witness # _____

Date/Time/Direction

Comments: NOT USED

TAT-06-F-

Photographer/Witness # _____

Date/Time/Direction

Comments: NOT USED

TAT-06-F-





TDD# 06-8503-16 Pg 5 of 6

Photographer/Witness # 9

BOND / WOODS

Date/Time/Direction

4/10/85, 1509 HRS, EAST

Comments: NORTH HALF OF

PANORAMA SHOWING EXTENSIVE

REMOVAL OF SUBSURFACE

CONTAMINATION AT PROJECT THREE

TAT-06-F- 08703

Photographer/Witness # _____

Date/Time/Direction

Comments: NOT USED

TAT-06-F-

Photographer/Witness # _____

Date/Time/Direction

Comments: NOT USED

TAT-06-F-



TDD# 06-8503-16 Pg 6 of 6

Photographer/Witness # 10

BOND / WOODS

Date/Time/Direction

4/10/85, 1509 HRS, EAST

Comments: SOUTH HALF OF

PANORAMA SHOWING EXTENSIVE

REMOVAL OF SUBSURFACE

CONTAMINATION AT PROJECT THR

TAT-06-F- 08704

Photographer/Witness # _____

Date/Time/Direction

Comments: NOT USED

TAT-06-F-

Photographer/Witness # _____

Date/Time/Direction

Comments: NOT USED

TAT-06-F-